

Distribution Integrity Management Program (DIMP)

Operator of Gas Distribution System

Village of Edinburg

Operator ID: **4240**
Operator: **EDINBURG GAS SYSTEM**
Address: **205 WEST WASHINGTON , P.O. BOX 350, EDINBURG, IL 62531**
(217) 623-5542

Inspection ID: **8**
Report Date: **1/17/2013**
Inspection Date: **1/15/2013**
States(s) included in this Inspection:

Agency Representatives:

Kevin Ketchum, Illinois Commerce Commission, 2174149356,
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Persons Interviewed:

Mike Lebshier, Gas Superintendent, 2176235542,
lebshier@mchsi.com

Inspector Comments:

| Q. | Rule Name: | Question | Answer | Details | Comments |
|----|------------------|--|----------------------------------|---|----------|
| 1 | 192.1005 | Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? OR For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation? | Yes or Satisfactory | The operator has a page dedicated to the version log. | |
| 2 | Information Only | Were commercially available product(s)/templates used in the development of the operator's written integrity management plan? Commercial product(s)/templates name if used: | Yes or Satisfactory Fully | SHRIMP was used to develop the plan. The operator used SHRIMP. | |
| 3 | Information Only | | | | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|------------------|------------------|---|------------------------------------|--|----------|
| | | Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions? | Yes or Satisfactory | The assignment of responsibility for implementation is included in Chapter 11 of the Plan. The Gas Superintendent is responsible for all implementation activities. | |
| 4 | 192.1007(a)(1) | Do the written procedures identify or reference the appropriate sources used to determine the following characteristics necessary to assess the threats and risks to the integrity of the pipeline: | | | |
| Chapter 3 page 3 | | | Design (e.g. type of construction, | Yes or Satisfactory | On |
| | | inserted pipe, rehabilitated pipe method, materials, sizes, dates of installation, mains and services, etc.)? | | the plan does detail the records used to develop the knowledge of the system. The plan includes the specific records that are available to define the materials, joining methods, test records used to determine the MAOP of specific main segments. | |
| | | Operating Conditions (e.g. pressure, gas quality, etc.)? | Yes or Satisfactory | | |
| | | Operating Environmental Factors (e.g. corrosive soil conditions, frost heave, land subsidence, landslides, washouts, snow damage, external heat sources, business districts, wall-to-wall paving, population density, difficult to evacuate facilities, valve placement, etc.)? | Yes or Satisfactory | The data sources for threats such as natural forces, third-party damages and outside forces are in the plan. | |
| 5 | 192.1007(a)(2) | Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)? | Yes or Satisfactory | The plan states that design records were used this information is defined on Page 3 of Chapter 3 of the operator plan. | |
| 6 | Information Only | | | | |

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|----|----------------|---|---------------------|--|----------|
| | | Do the written procedures indicate if the information was obtained from electronic records, paper records, or subject matter expert knowledge (select all which apply)? Electronic, Paper, SME | Paper - SME | The plan does state the records used were paper. SMEs used were listed. This information is defined on Page 3 of Chapter 3 of operator plan. | |
| 7 | 192.1007(a)(3) | Does the plan contain written procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records? | Yes or Satisfactory | No gaps were identified but a process is included to correct any discrepancies identified in the information through normal operations. This is defined in Chapter 11 on page 26 of the operator plan. | |
| 8 | 192.1007(a)(3) | Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records? | Yes or Satisfactory | No gaps were identified. This is defined in Chapter 11 on page 26 of the operator plan. | |
| 9 | 192.1007(a)(3) | Do the written procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)? | Yes or Satisfactory | No gaps were identified. This is defined in Chapter 11 on page 26 of the operator plan. | |
| 10 | 192.1007(a)(5) | Do the written procedures require the capture and retention of data on any new pipeline installed? | Yes or Satisfactory | This is defined in Chapter 3 on page 3 of the operator plan. | |
| 11 | 192.1007(a)(5) | | | | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|----|-------------|---|---------------------|---|----------------------|
| | | Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed? | | Yes or Satisfactory The data collection sheet is located in Section 16 of the O&M Plan. The collection sheet was included in Section 16 of the O&M Plan. A sample of the data collection sheet was provided for review and appears to meeting the intent of this requirement. | The Plan states that |
| 12 | 192.1007(a) | Does the documentation provided by the operator demonstrate implementation of the element "Knowledge of the System"? | Yes or Satisfactory | This is defined in Chapter 3 on page 3 of the operator plan. | |
| 13 | 192.1007(a) | Has the operator demonstrated an understanding of its system? | Yes or Satisfactory | This is defined in Chapter 3 on page 3 of the operator plan. | |
| 14 | 192.1007(b) | In identifying threats, do the written procedures include consideration of the following categories of threats to each gas distribution pipeline? | | | |
| | | Corrosion | Yes or Satisfactory | This is defined in Chapter 4 on page 5 of the operator plan. | |
| | | Natural Forces | Yes or Satisfactory | This is defined in Chapter 4 on page 11 of the operator plan. | |
| | | Excavation Damage | Yes or Satisfactory | This is defined in Chapter 4 on page 8 of the operator plan. | |
| | | Other Outside Force Damage | Yes or Satisfactory | This is defined in Chapter 4 on page 11 of the operator plan. | |
| | | Material or Welds | Yes or Satisfactory | This is defined in Chapter 4 on page 10 of the operator plan. | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|----|------------------|---|---------------------|---|----------|
| | | Equipment Failure | Yes or Satisfactory | This is defined in Chapter 4 on page 7 of the operator plan. | |
| | | Incorrect Operation | Yes or Satisfactory | This is defined in Chapter 4 on page 9 of the operator plan. | |
| | | Other Concerns | Yes or Satisfactory | This is defined in Chapter 4 on page 11 of the operator plan. | |
| 15 | 192.1007(b) | Did the operator consider the information that was reasonably available to identify existing and potential threats? | Yes or Satisfactory | This is defined in Chapter 3 on page 4 of the operator plan. | |
| 16 | Information Only | Does the plan subdivide the primary threats into subcategories to identify existing and potential threats? | Yes or Satisfactory | This is defined in Chapter 4 on page 4 of the operator plan. | |
| 17 | 192.1007(b) | Incident and leak history | Yes or Satisfactory | This is defined in Chapter 8 on page 21 of the operator plan. | |
| | | Corrosion control records | Yes or Satisfactory | This is defined in Chapter 8 on page 21 of the operator plan. | |
| | | Continuing surveillance records | Yes or Satisfactory | This is defined in Chapter 8 on page 21 of the operator plan. | |
| | | Patrolling records | Yes or Satisfactory | This is defined in Chapter 8 on page 21 of the operator plan. | |
| | | Maintenance history | Yes or Satisfactory | This is defined in Chapter 8 on page 21 of the operator plan. | |
| | | Excavation damage experience | Yes or Satisfactory | This is defined in Chapter 8 on page 21 of the operator plan. | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|----|------------------|---|---------------------|--|---|
| | | Other – Describe | Yes or Satisfactory | This is defined in Chapter 8 on page 21 of the operator plan. | |
| | | In identifying threats did the information considered include any of the following? | Yes or Satisfactory | This is defined in Chapter 8 on page 21 of the operator plan. | |
| 18 | Information Only | Does the plan categorize primary threats as either “system-wide” or “localized”? | All System-wide | This is defined in Chapter 4 on pages 4 - 12 of the operator plan. | All threats are categorized as system wide due to the size of the system. |
| 19 | Information Only | Do the written procedures consider, in addition to the operator’s own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats? | Yes or Satisfactory | This is defined in Chapter 3 on page 3 of the operator plan. The plan states that all PHMSA Advisory Bulletins were used during the threat identification. | |
| 20 | 192.1007(b) | Does the documentation provided by the operator demonstrate implementation of the element “Identify Threats”? | Yes or Satisfactory | This is defined in Chapter 3 on page 3 of the operator plan. The plan states that all PHMSA Advisory Bulletins were used during the threat identification. | |
| 21 | Information Only | Was the risk evaluation developed fully or in part using a commercially available tool? | Fully | Shrimp was used. | |
| | | Commercial tool name if used: | | | |
| 22 | 192.1007(c) | Do the written procedures contain the method used to determine the relative importance of each threat and estimate and rank the risks posed? Briefly describe the method. | Yes or Satisfactory | This is defined in Chapter 5 on page 13 of the operator plan. | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|----|---------------|--|---|---|----------|
| 23 | 192.1007(c) | <p>Do the written procedures to evaluate and rank risk consider:</p> <p>Each applicable current and potential threat?</p> <p>Corrosion</p> <p>Natural Forces</p> <p>Excavation Damage</p> <p>Other Outside Force Damage</p> <p>Material or Welds</p> <p>Equipment Failure</p> <p>Incorrect Operation</p> <p>Other Concerns</p> | <p>Yes or Satisfactory</p> <p>Yes or Satisfactory</p> <p>Yes or Satisfactory</p> <p>Yes or Satisfactory</p> <p>Yes or Satisfactory</p> <p>Yes or Satisfactory</p> <p>Yes or Satisfactory</p> <p>Yes or Satisfactory</p> | <p>This is defined in Chapter 11 on pages 24 - 53 of the operator plan.</p> <p>This is defined in Chapter 11 on pages 24 - 53 of the operator plan.</p> <p>This is defined in Chapter 11 on pages 24 - 53 of the operator plan.</p> <p>This is defined in Chapter 11 on pages 24 - 53 of the operator plan.</p> <p>This is defined in Chapter 11 on pages 24 - 53 of the operator plan.</p> <p>This is defined in Chapter 11 on pages 24 - 53 of the operator plan.</p> <p>This is defined in Chapter 11 on pages 24 - 53 of the operator plan.</p> <p>This is defined in Chapter 11 on pages 24 - 53 of the operator plan.</p> | |
| 24 | 192.1007(c) | <p>Do the written procedures to evaluate and rank risk consider:</p> <p>The likelihood of failure associated with each threat?</p> <p>Corrosion</p> | <p>Yes or Satisfactory</p> | <p>This is defined in Chapter 11 on pages 24 - 53 of the operator plan.</p> | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|----|---------------|--|---------------------|--|----------|
| | | Natural Forces | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| | | Excavation Damage | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| | | Other Outside Force Damage | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| | | Material or Welds | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| | | Equipment Failure | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| | | Incorrect Operation | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| | | Other Concerns | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| 25 | 192.1007(c) | Do the written procedures to evaluate and rank risk consider: The potential consequence of such a failure? Corrosion | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| | | Natural Forces | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| | | Excavation Damage | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| | | Other Outside Force Damage | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|----|------------------|---|---------------------|--|----------|
| | | Material or Welds | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| | | Equipment Failure | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| | | Incorrect Operation | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| | | Other Concerns | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 - 53 of the operator plan. | |
| 26 | 192.1007(c) | If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk? Briefly describe the approach. | Not Applicable | The operator does not subdivide the system. | |
| 27 | Information Only | Is the method used to evaluate and rank risks reasonable? | Yes or Satisfactory | This is defined in Chapter 5 on page 13 of the operator plan. | |
| 28 | 192.1007(c) | Are the results of the risk ranking supported by the risk evaluation model/method? | Yes or Satisfactory | This is defined in Chapter 5 on page 13 of the operator plan. | |
| 29 | 192.1007(c) | Did the operator validate the results generated by the risk evaluation model/method? Briefly describe. | Yes or Satisfactory | This is defined in Chapter 5 on page 13 of the operator plan. | |
| 30 | 192.1007(c) | Does the documentation provided by the operator demonstrate implementation of the element "Evaluate and Rank Risk"? | Yes or Satisfactory | This is defined in Chapter 5 on page 13 of the operator plan. | |
| 31 | 192.1007 (d) | | | | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|----|--------------|--|---------------------|--|----------|
| | | Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk? | Yes or Satisfactory | This is defined in Chapter 7 on page 19 of the operator plan. | |
| 32 | 192.1007 (d) | When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing? | Yes or Satisfactory | This is defined in Chapter 7 on page 19 of the operator plan. | |
| 34 | 192.1007 (d) | Locate the leaks in the distribution system; | Yes or Satisfactory | This is defined in Chapter 6 on pages 15 -17 of the operator plan. | |
| | | Evaluate the actual or potential hazards associated with these leaks; | Yes or Satisfactory | This is defined in Chapter 6 on pages 15 -17 of the operator plan. | |
| | | Act appropriately to mitigate these hazards; | Yes or Satisfactory | This is defined in Chapter 6 on pages 15 -17 of the operator plan. | |
| | | Keep records; | Yes or Satisfactory | This is defined in Chapter 6 on pages 15 -17 of the operator plan. | |
| | | Self-assess to determine if additional actions are necessary to keep people and property safe. | Yes or Satisfactory | This is defined in Chapter 6 on pages 15 -17 of the operator plan. | |
| | | Does the plan include an effective leak management program (unless all leaks are repaired when found) | Yes or Satisfactory | This is defined in Chapter 6 on pages 15 -17 of the operator plan. | |
| 35 | 192.1007 (d) | Does the documentation provided by the operator demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk? | Yes or Satisfactory | This is defined in Chapter 6.2 on page 17 of the operator plan. | |
| 36 | 192.1007 (e) | Does the plan contain written procedures for how the operator established a baseline for each performance measure? | | | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|----|--------------|---|---------------------|---|----------|
| | | i) Number of hazardous leaks either eliminated or repaired, categorized by cause? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | ii) Number of excavation damages? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | iii) Number of excavation tickets received by gas department? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | iv) Total number of leaks either eliminated or repaired categorized by cause? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | v) Number of hazardous leaks either eliminated or repaired, categorized by material? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| 37 | 192.1007 (e) | Does the plan establish a baseline for each performance measure? | | | |
| | | i) Number of hazardous leaks either eliminated or repaired, categorized by cause? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | ii) Number of excavation damages? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | iii) Number of excavation tickets received by gas department? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | iv) Total number of leaks either eliminated or repaired categorized by cause? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | v) Number of hazardous leaks either eliminated or repaired, categorized by material? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|----|--------------|---|---------------------|---|----------|
| | | vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| 38 | 192.1007 (e) | Does the operator have written procedures to collect the data for each performance measure? | | | |
| | | i) Number of hazardous leaks either eliminated or repaired, categorized by cause? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | ii) Number of excavation damages? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | iii) Number of excavation tickets received by gas department? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | iv) Total number of leaks either eliminated or repaired categorized by cause? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | v) Number of hazardous leaks either eliminated or repaired, categorized by material? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| 39 | 192.1007 (e) | Do the written procedures require the operator to monitor each performance measure? | | | |
| | | i) Number of hazardous leaks either eliminated or repaired, categorized by cause? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | ii) Number of excavation damages? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | iii) Number of excavation tickets received by gas department? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|------------|------------------|---|----------------------------------|---|----------|
| | | iv) Total number of leaks either eliminated or repaired categorized by cause? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | v) Number of hazardous leaks either eliminated or repaired, categorized by material? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| | | vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| 40 | 192.1007 (e) | When measures are required to reduce risk, do the written procedures provide how their effectiveness will be measured? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| 41 | Information Only | Can the performance measures identified by the operator in the plan be counted, monitored, and supported? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| 42 | 192.1007 (e) | Does the documentation provided by the operator demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"? | Yes or Satisfactory | This is defined in Chapter 7.1 on page 19 of the operator plan. | |
| 43 | 192.1007 (f) | Do the written procedures for periodic review include: | | | |
| defined in | | a. | Frequency of review based on the | Yes or Satisfactory | This is |
| | | complexity of the system and changes in factors affecting the risk of failure, not to exceed 5 years? | | Chapter 11 on pages 24 -66 of the operator plan. | |
| | | b. Verification of general information (e.g. contact information, form names, action schedules, etc.)? | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 -66 of the operator plan. | |
| | | c. Incorporate new system information? | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 -66 of the operator plan. | |
| | | d. Re-evaluation of threats and risk? | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 -66 of the operator plan. | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|------------|------------------|--|-------------------------------|---|----------|
| defined in | | e. Review the frequency of the measures to reduce risk? | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 -66 of the operator plan. | |
| | | f. Review the effectiveness of the measures to reduce risk? | Yes or Satisfactory | This is defined in Chapter 11 on pages 24 -66 of the operator plan. | |
| | | g. | Modify the measures to reduce | Yes or Satisfactory | This is |
| | | risk and refine/improve as needed (i.e. add new, modify existing, or eliminate if no longer needed)? | | Chapter 11 on pages 24 -66 of the operator plan. | |
| | | h. | Review performance measures, | Yes or Satisfactory | This is |
| defined in | | their effectiveness, and if they are not appropriate, refine/improve them? | | Chapter 11 on pages 24 -66 of the operator plan. | |
| 44 | Information Only | Does the plan contain a process for informing the appropriate operating personnel of an update to the plan? | Yes or Satisfactory | This is defined in Chapter 8 on page 21 of the operator plan. | |
| 45 | Information Only | Does the plan contain a process for informing the appropriate regulatory agency of a significant update to the plan? | Yes or Satisfactory | This is defined in Chapter 9 on page 22 of the operator plan. | |
| 46 | 192.1007 (f) | Does the documentation provided by the operator demonstrate implementation of the element "Periodic Evaluation and Improvement"? | Yes or Satisfactory | This is defined in Chapter 8 on page 21 of the operator plan. | |
| 47 | 192.1007 (g) | Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by § 191.11 and the State regulatory authority? | Yes or Satisfactory | This is defined in Chapter 9 on page 22 of the operator plan. | |
| 48 | Information Only | When required by the State, does the plan identify the specific report form, date, and location where it is to be submitted? | Yes or Satisfactory | This is defined in Chapter 9 on page 22 of the operator plan. | |
| 49 | 192.1007 (g) | | | | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|------|--------------|---|---|---|----------|
| | | Has the operator submitted the required reports? | Yes or Satisfactory | This is defined in Chapter 9 on page 22 of the operator plan. | |
| 50 | 192.1009 | Does the operator have written procedures to collect the information necessary to comply with the reporting requirements of 192.1009? | Yes or Satisfactory | This is defined in Chapter 9 on page 22 of the operator plan. | |
| 51 | 192.1011 | Does the operator have written procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years? | Yes or Satisfactory | This is defined in Chapter 10 on page 23 of the operator plan. | |
| 52 | 192.1011 | Does the operator have written procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years? | Yes or Satisfactory | This is defined in Chapter 10 on page 23 of the operator plan. | |
| 53 | 192.1011 | Has the operator maintained the required records? | Yes or Satisfactory | This is defined in Chapter 10 on page 23 of the operator plan. | |
| 54-1 | 192.1007 (d) | <p>1. For the top five highest ranked risks from the operator's risk ranking list the following:</p> <p>Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);</p> <p>Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);</p> <p>Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);</p> <p>Associated performance measure.</p> | <p>Excavation damage</p> <p>Third party</p> | <p>Re-evaluate the performance measure.</p> <p>Track the number of damages per 1000 excavation tickets.</p> | |

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|------|--------------|---|--|---|----------|
| 54-2 | 192.1007 (d) | <p>2. For the top five highest ranked risks from the operator's risk ranking list the following:</p> <p>Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);</p> <p>Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);</p> <p>Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);</p> <p>Associated performance measure.</p> | <p>Corrosion</p> <p>Atmospheric</p> | <p>Re-evaluate performance measure.</p> <p>An increase of one corrosion leak per year .</p> | |
| 54-3 | 192.1007 (d) | <p>3. For the top five highest ranked risks from the operator's risk ranking list the following:</p> <p>Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);</p> <p>Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);</p> <p>Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);</p> <p>Associated performance measure.</p> | <p>Equipment failure</p> <p>Regulators</p> | <p>Regulators Experiencing Failure and relief valve.</p> <p>Replace problem equipment.</p> | |
| 54-4 | 192.1007 (d) | <p>4. For the top five highest ranked risks from the operator's risk ranking list the following:</p> <p>Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);</p> | | | |

| Q. | Rule Name: | Question | Answer | Details | Comments |
|------|--------------|---|--------|---------|----------|
| | | <p>Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);</p> <p>Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);</p> <p>Associated performance measure.</p> | | | |
| 54-5 | 192.1007 (d) | <p>5. For the top five highest ranked risks from the operator's risk ranking list the following:</p> <p>Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);</p> <p>Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);</p> <p>Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);</p> <p>Associated performance measure.</p> | | | |